

Hon. Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ALISHAN AHMED,

Plaintiff,

v.

HYUNDAI CAPITAL AMERICA, INC.,
dba HYUNDAI MOTOR FINANCE, dba
KIA MOTOR FINANCE, a California
Corporation,

Defendant.

Case No. 3:25-cv-05134-BHS

**DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
RESPOND TO COMPLAINT
(THIRD EXTENSION)**

**NOTE ON MOTION CALENDAR:
MARCH 12, 2025**

LCR 7(j) CERTIFICATION

In compliance with Local Civil Rule 7(j), counsel for Defendant Hyundai Capital America, Inc. conferred with counsel for Plaintiff regarding this motion. Plaintiff does not oppose this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), Defendant moves the Court for an order extending the deadline to file an answer or other responsive pleading to March 28, 2025.

On February 24, 2025, this Court granted Defendant's Unopposed Motion for Extension of Time to Respond to Complaint, setting the deadline to respond for March 7, 2025. (ECF No. 6).

DEFENDANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE ANSWER
TO COMPLAINT (THIRD EXTENSION):
CASE NO. 3:25-cv-05134-BHS

HOLLAND & KNIGHT LLP
601 SW Second Avenue, Suite 1800
Portland, OR 97204
Telephone: 503.243.2300

1 On March 3, 2025, this Court granted Defendant's Second Unopposed Motion for
 2 Extension of Time to Respond to Complaint, setting the deadline to respond for March 14, 2025.
 3 (ECF No. 8).

4 Since that time, counsel have continued to discuss the potential for arbitration of the
 5 claims asserted in this matter, including a possible stipulation to move these claims to
 6 arbitration. The parties have made good progress in their discussions, including proposing
 7 potential arbitrators. Counsel for Defendant seeks a further extension of time to permit the parties
 8 to continue their ongoing discussions. Further, the additional time will assist Defendant in
 9 gathering information to prepare any response that may be necessary.

10 This is the third request for an extension of time filed in this matter. Including the instant
 11 request, Defendant's requests to extend the deadline now total 28 days from the original
 12 deadline. This motion is not filed for the purpose of delay, and no party will be prejudiced by the
 13 granting of this motion. By filing this motion, Defendant does not waive and expressly reserves
 14 all defenses and objections it may have in this action, including but not limited to the defenses
 15 made available by Fed. R. Civ. P. 12 and the defense that Plaintiff's claims are subject to binding
 16 arbitration.

17
 18 Dated this 12th day of March, 2025

19 HOLLAND & KNIGHT LLP

20 By: s/Garrett S. Garfield

21 Garrett S. Garfield, WSBA No. 48375

22 E-mail: garrett.garfield@hklaw.com

23 601 SW Second Avenue, Suite 1800

24 Portland, OR 97204

25 Telephone: 503.243.2300

26 *Attorneys for Hyundai Capital America, Inc., dba
 Hyundai Motor Finance, dba Kia Motor Finance*

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT (THIRD EXTENSION) to be served on the following person[s]:

SaraEllen Hutchison,
LAW OFFICE OF
SARAELLEN HUTCHISON, PLLC
1102 A ST
STE 300 PMB 66
Tacoma, WA 98402
Telephone: 206-529-5195
Facsimile: (253) 302-8486
E-mail: saraellen@saraellenhutchison.com

Attorneys for Plaintiff

by causing the document to be delivered by the following indicated method or methods:

☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.

DATED March 12, 2025.

s/Garrett S. Garfield

Hon. Benjamin H. Settle

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

ALISHAN AHMED,
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v.

HYUNDAI CAPITAL AMERICA, INC.,
dba HYUNDAI MOTOR FINANCE, dba
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Corporation,

Defendant.

Case No. 3:25-cv-05134-BHS

**ORDER GRANTING DEFENDANT'S
UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO COMPLAINT
(THIRD EXTENSION):**

Defendant Hyundai Capital America, Inc., dba Hyundai Motor Finance, dba Kia Motor Finance, ("Defendant"), has filed an Unopposed Motion for Extension of Time to answer, move, or otherwise respond to Plaintiffs' Complaint.

Upon consideration of this Motion, for good cause shown and by agreement of the parties, it is hereby,

ORDERED that Defendant's Unopposed Motion for Extension of Time is **GRANTED**.

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ORDER GRANTING DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE
ANSWER TO COMPLAINT (THIRD EXTENSION):
CASE NO. 3:25-cv-05134-BHS

1 It is FURTHER ORDERED that Defendant shall answer, move, or otherwise respond
2 to Plaintiff's Complaint by March 28, 2025.

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4 Dated this 14th day of March, 2025

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Benjamin H. Settle
United States District Court Judge

Submitted By: s/Garrett S. Garfield

Garrett S. Garfield, WSBA No. 48375
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*Attorneys for Hyundai Capital America, Inc.,
dba Hyundai Motor Finance, dba Kia Motor
Finance*

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing [PROPOSED] ORDER GRANTING DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO COMPLAINT (THIRD EXTENSION):to be served on the following person[s]:

SaraEllen Hutchison,
LAW OFFICE OF
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1102 A ST
STE 300 PMB 66
Tacoma, WA 98402
Telephone: 206-529-5195
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E-mail: saraellen@saraellenhutchison.com

Attorneys for Plaintiff

by causing the document to be delivered by the following indicated method or methods:

☒ by CM/ECF electronically mailed notice from the Court on the date set forth below.

DATED March 12, 2025.

s/Garrett S. Garfield